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Dianne B. Kuhnell. Senior Paralegal

VIA OVERNIGHT DELIVERY

September 25, 2009

RECEIVED

SEP 28 2009

PUBLIC SERVICE COMMISSION

Mr. Jeff Derouen Executive Director Kentucky Public Service Commission 211 Sower Blvd Frankfort, KY 40601

Re: Case No. 2009-00202

Dear Mr. Derouen:

Enclosed please find for filing an original and twelve copies of Duke Energy Kentucky's Responses to Third Data Request of Commission Staff and Duke Energy Kentucky's Responses to Attorney General's Supplemental Requests for Information.

Please date-stamp the extra two copies of the letter and two copies of each set of Responses and return to me in the enclosed envelope.

Sincerely,

Dianne B. Kuhnell Senior Paralegal

cc: Dennis Howard II

State of Ohio
County of Hamilton

The undersigned, James E. Ziolkowksi being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as Rates Manager; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the responses to the foregoing responses to information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquire.

James E. Ziolkowski, Affiant

Subscribed and sworn to before me by James E. Ziolkowski on this day of September, 2009.

NOTARY PUBLIC

My Commission Expires: 9 - 15 - 2014

State of Ohio)
)
County of Hamilton)

The undersigned, Julia S. Janson being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as President – Duke Energy Ohio, Inc. and Duke Energy Kentucky, Inc.; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the responses to the foregoing responses to information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquiry.

Julia S. Janson, Affiant

Subscribed and sworn to before me by Julia S. Janson on this <u>3/6/f</u>day of September, 2009.

My Commission Expires:

ANITA M. SCHAFER
Notary Public, State of Ohio
My Commission Expires
November 4, 2009

State of Ohio)
County of Hamilton)

The undersigned, Gary J. Hebbeler being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as General Manager, Gas Engineering; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the responses to the foregoing responses to information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquire.

Gary J. Hebbeler, Affiant

Subscribed and sworn to before me by Gary J. Hebbeler on this **2/37** day of September, 2009.

My Commission Expires:

Selufu

ANITA M. SCHAFER Notary Public, State of Ohio My Commission Expires November 4, 2009

Commonwealth of Pennsylvania	
County of Cumberland	

The undersigned, John J. Spanos, being duly sworn, deposes and says that he is a Vice President of the Valuation and Rate Division associated with the firm of Gannett Fleming, Inc., and says that he has supervised the preparation of the responses to the foregoing responses to information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of his knowledge, information and belief after reasonable inquire.

John J. Spanos, Affiant

Subscribed and sworn to before me by John J. Spanos on this /// day of September, 2009.

NOTARY PUBLIC

My Commission Expires: February 20, 2011

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal Cheryl Ann Rutter, Notary Public East Pennsboro Twp., Cumberland County My Commission Expires Feb. 20, 2011

Member, Pennsylvania Association of Notaries

State of Ohio)
)
County of Hamilton)

The undersigned, Donald L. Storck being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as Director of Rate Services; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the responses to the foregoing responses to information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquire.

Donald L. Storck, Affiant

Subscribed and sworn to before me by Donald L. Storck on this 17 H/day of September, 2009.

My Commission Expires:

Anta M. Schafe NOTARY PUBLIC

> ANITA M. SCHAFER Notary Public, State of Ohio My Commission Expires November 4, 2009

269137 v.9

State of Ohio	
County of Hamilton)

The undersigned, William Don Wathen Jr., being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as Director - Rates; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the responses to the foregoing responses to information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquire.

William Don Wathen Jr., Affiant

Schafen

ANITA M. SCHAFER Notary Public, State of Ohio My Commission Expires November 4, 2009

Subscribed and sworn to before me by William Don Wathen Jr. on this 22nd day of September 2009.

My Commission Expires:

State of Ohio)
)
County of Hamilton)

The undersigned, Robert M. Parsons being duly sworn, deposes and says that I am employed by the Duke Energy Corporation affiliated companies as Rates Manager; that on behalf of Duke Energy Kentucky, Inc., I have supervised the preparation of the responses to the foregoing responses to information requests; and that the matters set forth in the foregoing response to information requests are true and accurate to the best of my knowledge, information and belief after reasonable inquire.

Robert M. Parsons, Affiant

Subscribed and sworn to before me by Robert M. Parsons on this 1844 day of September, 2009.

My Commission Expires:

anita M. Schafn NOTARY PUBLIC

ANITA M. SCHA

My Commission Expires November 4, 2009

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STAFF-DR-03-001

REQUEST:

Refer to the response to Item 2.d. of Commission Staff's Second Data Request ("Staff's Second Request"). Some schedules were provided on a total basis as requested; however, Schedules 13 and 13.2 were not. Provide Schedules 13 and 13.2 on a total basis or explain why they cannot be provided.

RESPONSE:

Schedules 13 and 13.2 are not available on a total basis. The response to Item 2.d of the Commission Staff's Second Data Request was prepared by summing up the Commodity, Demand and Customer amounts from Exhibits FR-10(9)v-2, FR-10(9)v-3, FR-10(9)v-4 and FR-10(9)v-5. The allocation percentages on Schedule 13 and 13.2 of each of these Exhibits are unique to the customer class being classified and were not prepared on a total basis.

PERSON RESPONSIBLE: Donald L. Storck

STAFF-DR-03-002

REQUEST:

Refer to the attachment to the response to Item 6 of Staff's Second Request which includes the customer charges and volumetric charges that would be required if the customer charges fully recovered all fixed costs necessary to serve customers. For all four rate classes, the volumetric charge is zero. Explain whether it is Duke Kentucky's contention that it incurs no variable costs, other than the cost of gas, in the provision of service to its customers.

RESPONSE:

The Company considers that, within the normal range of sales experienced by the company, almost all of the costs to provide gas service, other than the cost of gas, are fixed. There are some variable costs such as odorant, but the magnitude of the variable costs is small compared with the total cost of providing service. In the response to STAFF-DR-002-006, the Company assumed that all costs are fixed to simplify the analysis.

PERSON RESPONSIBLE: James E. Ziolkowski

Duke Energy Kentucky, Inc. Case No. 2009-00202

Third Set Staff Data Requests Date Received: September 14, 2009

STAFF-DR-03-003

REQUEST:

Refer to the response to Item 9.a. of Staff's Second Request.

a. For the meter pulse installation charge and the meter index charge, explain why the truck cost of \$7.00 per hour would be charged for the installation time (i.e., the non-

travel time).

b. For the meter index charge, materials are listed at \$90. Identify the specific

materials that make up this amount.

c. For the additional trip charge, provide itemized cost information as was provided for

the meter pulse installation and meter index charges.

RESPONSE:

a. The vehicle is in use at the job site for tools, materials etc. while the labor is being

performed. It cannot be taken and used elsewhere.

b. DC powered isolation switch, pulser board, weather-proof box, flex conduit, seal-off, wiring and misc. hardware. Every installation is different based on different meter

sets, locations, etc., and cost may exceed this conservative amount.

c. Slightly less than 2 hrs. @ \$25.50 labor, \$7.00 truck (Total \$32.50/hr.)

PERSON RESPONSIBLE: James E. Ziolkowski

STAFF-DR-03-004

REQUEST:

Refer to the response to Item 14 of Staff's Second Request, which describes the process used by J.D. Power and Associates ("J.D. Power") to rate customer satisfaction by residential customers for the country's 60 largest gas utilities.

- a. Explain how the size of gas utilities is measured by J.D. Power for purposes of its study of residential customer satisfaction.
- b. Explain whether Duke Kentucky is one of the 60 largest gas utilities in the U.S., as measured by J.D. Power, and where it ranks among those 60 utilities.
- c. If it is not one of the 60 largest gas utilities in the U.S., explain how the results of the J.D. Power study are specifically applicable to Duke Kentucky.

RESPONSE:

- a. Based on number of customers served. Duke Energy Midwest (for the gas study is Duke Energy Ohio and Duke Energy Kentucky) meets the requirement customer base of 225,000 or more households served.
- b. The survey ranks Duke Energy as Duke Energy Midwest and does not break out the operating companies that make up Duke Energy Midwest by state. Duke Energy Kentucky on its own would not be large enough but the study does not rank Duke Energy by operating company only by region.
- c. The results are applicable to Duke Energy Kentucky because Kentucky customers are part of the group being surveyed. The results are not separated out by state.

PERSON RESPONSIBLE: Julia S. Janson

Duke Energy Kentucky, Inc. Case No. 2009-00202

Third Set Staff Data Requests

Date Received: September 14, 2009

STAFF-DR-03-005

REQUEST:

Refer to the response to Item 20 of Staff's Second Request and Schedule D-2.11 of Duke Kentucky's application.

a. Describe in detail the type of activities that gave rise to the jobbing expense incurred

during the base period, as described in Schedule D-2.11.

b. Explain what caused Duke Kentucky to incur negative amortization expense of

\$362,672 during the base period.

RESPONSE:

a. Schedule D-2.11 was incorrectly labeled jobbing expense. It should have been labeled other operating expenses. The \$362,672 of other operating expenses was for

DSM amortization.

b. Duke Energy Kentucky incurred negative amortization expense because the program

had overcollected and the overcollection was being refunded to ratepayers.

PERSON RESPONSIBLE: Robert M. Parsons

STAFF-DR-03-006

REQUEST:

Refer to the response to Item 21 of Staff's Second Request concerning the adjustment to property tax expense in December 2008 due to the final "Property Valuation" from the Kentucky Department of Revenue (formerly Kentucky Revenue Cabinet).

- a. Since 2000, identify each calendar year in which Duke Kentucky received a final "Property Valuation" from the Kentucky Department of Revenue which resulted in lowering property tax expense from the level based on an earlier property valuation from the Kentucky Department of Revenue.
- b. For each year identified in responding to part a. of this request, provide the amounts of both the initial and final property valuations and the amounts of both the initial and final property tax expense due pursuant to those valuations.

RESPONSE:

- a. In each of the years 2001 through 2008, Duke Kentucky received a final "Property Valuation" from the Kentucky Department of Revenue which resulted in lowering property tax expense from the level based on an earlier property valuation from the Kentucky Department of Revenue. (Year 2000 data is not available.)
- b. See attachment Staff-DR-03-006. (Year 2000 data is not available.)

PERSON RESPONSIBLE: Robert M. Parsons

DUKE ENERGY KENTUCKY COMPARISON OF 2001 - 2008 TENTATIVE KENTUCKY ASSESSMENTS TO FINAL KENTUCKY ASSESSMENTS

15	Final	158,000,000 92,000,000 66,008,538 1,991,462 318,000,000	51.70% 164,406,000 1.1369% \$1,869,100	2001	Final	131,861,850 77,309,290 55,150,460 2,178,400 266,500,000	43.82% 116,780,300 1.0191% \$1,190,100
2005	Tentative	184,193,967 265,362,832 92,000,000 1,991,462 543,548,261	51.70% 281,014,451 1.1369% \$3,194,900	20	Tentative	149,105,420 155,121,829 65,394,181 1,962,930 371,584,360	43.82% 162.828,267 1.0191% \$1,659,400
9	Final	209,500,300 130,915,310 63,511,260 1,841,070 405,767,940	31.48% 127,735,748 1.2352% \$1,577,800	2002	Final	158,333,510 71,347,310 50,372,440 1,946,740 282,000,000	43.60% 122,952,000 1.0508% \$1,292,000
2006	Tentative	209,500,300 259,476,178 63,511,260 1,841,070 534,328,808	31.48% 168,206,709 1.2352% \$2,077,700	20	Tentative	158,333,510 161,674,660 50,372,440 1,946,740 372,327,350	43.60% 162,334,725 1.0508% \$1,705,800
	Final	220,415,000 127,940,800 238,327,000 8,390,500 595,073,300	34.59% 205.835,854 0.8892% \$1,830,300	000	Final	158,000,000 65,500,000 46,158,315 2,341,685 272,000,000	40.64% 110,540,800 1.0781% \$1,191,700
2007	Tentative	242,219,760 184,007,986 261,845,211 11,826,535 699,899,492	34.59% 242,095,234 0.8892% \$2,152,700	ć	Tentative	162,010,160 109,042,677 49,285,508 2,341,685 322,680,030	40.64% 131,137,164 1.0781% \$1,413,800
	Final	226,200,000 131,640,000 238,920,000 3,240,000 600,000,000	35.51% 213,060,000 0.9011% \$1,919,900		2004 Final	158,000,000 72,000,000 66,033,888 1,966,112 298,000,000	40.68% 121,226,400 1.0792% \$1,308,300
	2008 Tentative	242,219,760 234,108,494 261,845,211 11,826,535 750,000,000	35.51% 266,325,000 0.9011% \$2,399,900		20 Tentative	189,761,220 141,227,961 67,596,158 1,966,112 400,551,451	40.68% 162,944,330 1.0792% \$1,758,500
		Real Estate Tangible Property Manufacturing Machinery Business Inventory Assessment	Gas Allocation Gas Valuation Average Tax Rate Gas Taxes Proposed/Paid			Real Estate Tangible Property Manufacturing Machinery Business Inventory Assessment	Gas Allocation Gas Valuation Average Tax Rate Gas Taxes Probosed/Paid

STAFF-DR-03-007

REQUEST:

Refer to the response to Item 24 of Staff's Second Request in which Duke Kentucky provided revised schedules in the event the Commission does not approve its proposed treatment of uncollectible expense. Provide a revised Schedule M-2.3, showing revised revenues and rates.

RESPONSE:

Please see Attachment STAFF-DR-03-007.

PERSON RESPONSIBLE: James E. Ziolkowski

DATA: BASE PERIOD X_FORECASTED PERIOD
TYPE OF FILING: X_ORIGINAL UPDATED ___ REVISED
WORK PAPER REFERENCE NO(S)...
12 MOS FORECASTED

EXCLUDES ALL RIDERS PROPOSED ANNUALIZED

SCHEDULE M-2.3
PAGE 1 OF 7
WITNESS:
J. ZIOLKOWSKI

PROPOSED TOTAL REVENUE (F + H) (f)	(\$) 95,612,039 95,612,039	32,984,870 3,783,638 5,233,967 42,002,475	137,614,514	2,667,468 1,368,030 4,035,498 141,650,012	0 10,116 21,876 34,176 43,376 600,696 0 600,696 743,924 743,924
GAS COST REVENUE(3) (H)	(\$) 49,819,246 49,819,246	22,445,055 2,796,514 3,844,704 29,086,273	78,905,519	0 0 0 78,905,519	33,848 0 0 0 0 0 0 0 0 78,939,367
% OF REV TO TOTAL LESS GAS COST REVENUE (G)	(%) 100.00 72.17	81.60 7.64 10.76 20.36	92.52	66.10 33.90 6.36 98.88	0.00 1.42 3.08 4.81 1.34 0.00 84.60 0.00 1.17 1.17
PROPOSED REVENUE LESS GAS COST REVENUE(4) (F)	(\$) 45,792,793 45,792,793	10,539,815 987,124 1,389,263 12,916,202	58,708,995	2,667,468 1,368.030 4,035,498 62,744,493	10,116 21,876 34,176 9,528 600,696 33,684 710,076
PROPOSED RATES (E)	(\$/MCF) 6.8348 6.8348	3.4917 2.6247 2.6869 3.3020	5.5326	2.3022 1.1145 1.6912 4.8274	4.8803
SALES(2)	(MCF) 6,699,903 6,699,903	3,018,506 376,087 517,052 3,911,645	10,611,548	1,158,636 1,227,496 2,386,132 12,997,680	4,552 0 0 0 0 0 0 0 0 0 13,002,232
CUSTOMER BILLS(1) (C)	1,073,044	77,136 2,746 4,452 84,334	1,157,378	1,020 288 1,308	0 0 0 0 0 0 0 0 0 0 0 0
TE CLASS / DE DESCRIPTION (B)	SALES SERVICE: RS RESIDENTIAL TOTAL RS	COMMERCIAL INDUSTRIAL OTH PUB AUTH TOTAL GS	TOTAL SALES SERVICE	TRANSPORTATION SERVICE: FT-LARGE FIRM TRANSP - LARGE IT INTERRUPTIBLE TOTAL TRANSP SERVICE	MISCELLANEOUS REVENUES: LATE PAYMENT CHARGES BAD CHECK CHARGES RECONNECTION CHARGES RENTS INTERDEPARTMENTAL SPECIAL CONTRACTS REVENUE TRANSP OF GAS-INTERCO PROVISION FOR RATE REFUNDS OTHER MISC TOTAL MISCELLANEOUS
LINE RATE NO. CODE (A)	1 SALE: 2 RS 3	4 GS 5 GS 7 GS	8 101,	9 IRAN 10 FT-LA 11 IT 12 TOT.	14 MISCEL 15 LATE P. 16 BAD CH 17 RECON 17 RECON 18 INTERD 20 SPECIA 21 REVEN 22 PROVIS 23 OTHER 24 TOTAL

⁽¹⁾ DETAIL CONTAINED ON SCHEDULES M-2.3, PAGES 2 THROUGH 7. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.

CASE NO. 2009-00202 ANNUALIZED TEST YEAR REVENUES AT PROPOSED VS. MOST CURRENT RATES FOR THE TWELVE MONTHS ENDED JANUARY 31, 2011 (GAS SERVICE) DUKE ENERGY KENTUCKY

PROPOSED ANNUALIZED

SCHEDULE M-2.3 PAGE 2 OF 7 WITNESS: J. ZIOLKOWSKI

> DATA: BASE PERIOD X FORECASTED PERIOD
> TYPE OF FILING: X ORIGINAL UPDATED REVISED
> WORK PAPER REFERENCE NO(S):: 12 MOS FORECASTED

107,304 (732,259) (624,955)63,420,719 94,987,084 95,612,039 32,191,320 PROPOSED TOTAL REVENUE (F + H) Ξ 8 49,819,246 49,819,246 49,819,246 REVENUE(3) GAS COST 3 (1.4) 100.0 0.2 71.3 30.1 101.4 % OF REV TO TOTAL LESS GAS COST REVENUE © 8 107,304 (732,259) (624,955) PROPOSED REVENUE LESS 13,601,473 45,792,793 45,167,838 32,191,320 GAS COST REVENUE Œ 9 2.0301 (0.109294) \$30.00 \$0.10 PROPOSED RATES (\$/MCF) ω 6,699,903 6,699,903 6,699,903 SALES(2) (D) (MCF) 1,073,044 1,073,044 1,073,044 CUSTOMER BILLS(1) <u></u>0 TOTAL RATE RS RESIDENTIAL INCLUDING RIDERS HOME ENERGY ASSISTANCE PROGRAM (HEA) DEMAND SIDE MANAGEMENT RATE (DSMR) CLASS / DESCRIPTION TOTAL MONTHLY BILLS x CUSTOMER CHARGE PER MONTH <u>B</u> RATE RS EXCLUDING RIDERS RESIDENTIAL COMMODITY CHARGE: ALL CONSUMPTION CUSTOMER CHARGE: TOTAL RIDERS RESIDENTIAL RIDERS: RATE CODE (A) 5 12 4 6 9 ~ 9 9 7 N S S

⁽¹⁾ BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.438816/MCF.

DATA: BASE PERIOD X FORECASTED PERIOD
TYPE OF FILING: X ORIGINAL UPDATED REVISED
WORK PAPER REFERENCE NO(S).:
12 MOS FORECASTED

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PROPOSED ANNUALIZED

SCHEDULE M-2.3 PAGE 3 OF 7 WITNESS: J. ZIOLKOWSKI

1						PROPOSED REVENUE LESS	% OF REV TO TOTAL LESS		PROPOSED TOTAL
	RATE CODE (A)	CLASS / DESCRIPTION (B)	CUSTOMER BILLS(1) (C)	SALES(2) (D)	PROPOSED RATES (E)	GAS COST REVENUE (F)	GAS COST REVENUE (G)	GAS COST REVENUE(3) (H)	REVENUE (F + H) (!)
- 1				(MCF)	(\$/MCF)	(\$)	(%)	(\$)	(\$)
	GS COMMERCIAL	٩L							
7 to 4 to	CUSTOMER CHARGE: NON-RESIDENTIAL TOTAL MONTHLY BILLS x : CUSTOMER CHARGE PER MONTH	ILLS x : SE PER MONTH	77,136		\$47.50	3,663,960	34.8		3,663,960
	COMMODITY CHARGE: ALL CONSUMPTION	:: '		3,018,506	2.2779	6,875,855	65.2	22,445,055	29,320,910
	RATE GS COMMERCIA	RATE GS COMMERCIAL EXCLUDING RIDERS	77,136	3,018,506		10,539,815	100.0	22,445,055	32,984,870
e 5	RIDERS: DEMAND SIDE MANAG	RIDERS: DEMAND SIDE MANAGEMENT RATE (DSMR)			0.00000	0	0.0		0
	TOTAL RIDERS					0	0.0		0
. 2	TOTAL RATE GS COM	TOTAL RATE GS COMMERCIAL INCLUDING RIDERS	77,136	3,018,506		10,539,815	100.0	22,445,055	32,984,870
	(1) BILLS THAT TERMINATE IN RESPEC' (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GA	(1) BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.	5816/MCF.						

DATA: BASE PERIOD X_FORECASTED PERIOD
TYPE OF FILING: X_ORIGINAL UPDATED REVISED
WORK PAPER REFERENCE NO(S).:
12 MOS FORECASTED

PROPOSED ANNUALIZED

SCHEDULE M-2.3 PAGE 4 OF 7 WITNESS: J. ZIOLKOWSKI

						010000	OT 120 20 %		CHACACAG
						REVENUE LESS	TOTAL LESS		TOTAL
u d	n+40	188413	CHSTOMER		PROPOSED	GAS COST	GAS COST	GAS COST	REVENUE
בו בו	7 200	Ľ.	BILLS(1)	SALES(2)	RATES	REVENUE	REVENUE	REVENUE(3)	(F + H)
į	(A)		(0)	(0)	(E)	(F)	(9)	Ŧ)	€
				(MCF)	(\$/MCF)	(\$)	(%)	(\$)	(s)
-	gs	INDUSTRIAL							
,	4010	COTOMOD OUNDORS							
71 10	NON-RE	COSTOMER CHARGE. NON-RESIDENTIAL							
4	TOTAL	TOTAL MONTHLY BILLS x			!		9		120 435
ις,	CUST	CUSTOMER CHARGE PER MONTH	2,746		\$47.50	130,435	13.2		7
9	COMMO	COMMODITY CHARGE:		376 087	9776 6	856 689	86.88	2.796.514	3,653,203
	ALL C	ALL CONSUMPTION		2000	1111				
00		RATE GS INDUSTRIAL EXCLUDING RIDERS	2,746	376,087		987,124	100.0	2,796,514	3,783,638
9 6		RIDERS: DEMAND SIDE MANAGEMENT RATE (DSMR)			0.000000	0	0.0		0
2							•		•
Ŧ	TOTAL RIDERS	RIDERS				0	0.0	4	
12		TOTAL RATE GS INDUSTRIAL INCLUDING RIDERS	2,746	376,087		987,124	100.0	2,796,514	3,783,638
								,	
	(1) BILL!	(1) BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS.	TEPS.						
	(2) REFL (3) REFL	(2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.	\$7.435816/MCF.						

PROPOSED ANNUALIZED

SCHEDULE M-2.3 PAGE 5 OF 7 WITNESS: J. ZIOLKOWSKI

DATA: ____ BASE PERIOD _X_FORECASTED PERIOD
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12 MOS FORECASTED

12 MOS FORECASTED	ECASTED			PROPOSED ANNUALIZED	ALIZED				DROPOSED
						PROPOSED PEVENIE (ESS	% OF REV TO TOTAL LESS		TOTAL
LINE	RATE	CLASS / DESCRIPTION	CUSTOMER BILLS(1)	SALES(2) (D)	PROPOSED RATES (E)	GAS COST REVENUE (F)	GAS COST REVENUE (G)	GAS COST REVENUE(3) (H)	(F + H)
	(A)	(B)		(MCF)	(\$/MCF)	(\$)	(%)	(\$)	(\$)
-	GS OTHE	OTHER PUBLIC AUTHORITIES							
0 to 4	CUSTOMER CHARGE: NON-RESIDENTIAL TOTAL MONTHLY BILLS X	STOMER CHARGE: NN-RESIDENTIAL TOTAL MONTHLY BILLS X :	4,452		\$47.50	211,470	15.2		211,470
n a	COMMODITY CHARGE:	CHARGE TEN MONTO		517.052	2.2779	1,177,793	84.8	3,844,704	5,022,497
^	ALL CONSUMPTION	NOILON	4.452	517,052		1,389,263	100.0	3,844,704	5,233,967
ω (RATE GS OPA E	RATE GS OPA EXCLUDING RIDERS			000000	0	0.0		0
. O	DEMAND SIDE	RIDERS. DEMAND SIDE MANAGEMENT RATE (DSMR)				0	0.0		0
7	TOTAL RIDERS			517 052		1,389,263	100.0	3,844,704	5,233,967
12		TOTAL RATE GS OPA INCLUDING RIDERS	4,432						

⁽¹⁾ BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.

SCHEDULE M-2.3 PAGE 6 OF 7 WITNESS: J. ZIOLKOWSKI

DATA: BASE PERIOD X_FORECASTED PERIOD
TYPE OF FILING: X_ORIGINAL __UPDATED ___ REVISED
WORK PAPER REFERENCE NO(S)::
12 MOS FORECASTED

PROPOSED TOTAL REVENUE (F+H) ε (S) GAS COST REVENUE(3) (\$) % OF REV TO TOTAL LESS GAS COST REVENUE ල 8 PROPOSED REVENUE LESS GAS COST REVENUE Œ 9 PROPOSED RATES (\$/MCF) (ii) PROPOSED ANNUALIZED SALES(2) (MCF) <u>e</u> CUSTOMER BILLS(1) 0 CLASS / DESCRIPTION (B) RATE CODE (A) R 6

	438,600	2,228,868	2,667,468		(33,600)	(33,600)	2,633,868	
	16.7		101.3		(1.3)	(1.3)	100.0	
	438,600		2,228,868		(33,600)	(33,600)	2,633,868	
	\$430.00		1.9237		(0.0290)			A CONTRACTOR OF THE PROPERTY O
			1,158,636	1,158,636			000	000'001'1
		1,020		1,020				1,020
				irs		TION (GCAT)		ING RIDERS
	ATION - LARGE	CHARGE	N CHARGE: TION	EXCLUDING RIDE		STMENT TRANSI		LARGE INCLUD
	FT - LARGE FIRM TRANSPORTATION - LARGE	ADMINISTRATIVE CHARGE	TRANSPORTATION CHARGE: ALL CONSUMPTION	RATE FT-LARGE EXCLUDING RIDERS	RIDERS:	GAS COST ADJUSTMENT TRANSITION (GCAT)	TOTAL RIDERS	TOTAL RATE FT - LARGE INCLUDING RIDERS
-	- 2	ы	4 ro	9	7	œ	თ	10

(1) REFLECTS NORMALIZED VOLUMES.

SCHEDULE M-2.3 PAGE 7 OF 7 WITNESS: J. ZIOLKOWSKI

DATA: BASE PERIOD X FORECASTED PERIOD
TYPE OF FILING: X ORIGINAL UPDATED REVISED
WORK PAPER REFERENCE NO(S)::
12 MOS FORECASTED

12 MOS FORECASTED	RECASTED			PROPOSED ANNUALIZED	UALIZED				
						PROPOSED	% OF REV TO		PROPOSED
LINE	RATE	CLASS/	CUSTOMER	(6)61	PROPOSED	REVENUE LESS GAS COST REVENUE	TOTAL LESS GAS COST REVENUE	GAS COST REVENUE(3)	REVENUE (F + H)
NO.	CODE (A)	DESCRIPTION (B)	(C)	(D)	(E)	(F)	(9)	(H)	0
				(MCF)	(\$/MCF)	(\$)	(%)	(s)	(\$)
- 0	IT INTERRUPTIBLE TRANSPORTATION	RANSPORTATION							
. "	ADMINISTRATIVE CHARGE	CHARGE	288		\$430.00	123,840	9.1		123,840
o 4	COMMODITY CHARGE:	AGE:			3	777	0		1,244,190
. C	ALL CONSUMPTION	NOI.		1,227,496	1.0138	061,444,1			
Ç	TOTAL RATE IT TRANSPORTATION	RANSPORTATION	288	1,227,496		1,368,030	100.0		1,368,030

STAFF-DR-03-008

REQUEST:

Refer to the responses to Items 25 and 38.a. of Staff's Second Request and to Item 30 of Staff's First Request.

- a. The response to Item 25 demonstrates that, over the last five years, the company's actual uncollectible expense was roughly \$6.1 million and it experienced a net over-recovery over that period of slightly less than \$123,000, roughly two percent of its total uncollectible expense. Explain how this type of result warrants removing uncollectible expense from base rate recovery.
- b. The response to Item 38.a. states that "[b]ad debt constitutes over 1% of the Company's expenses." Explain how Duke Kentucky determined that one percent of its expenses is the threshold for determining that a given expense warrants treatment other than being recovered through base rates.
- c. Given that, for 2008, the most recent calendar year for which data is available, the level of uncollectible expense of \$1,196,497 shown in the response to Item 25 is less than one percent of the company's 2008 total utility operating expenses as shown in the response to Item 30 of Staff's First Data Request, what is the basis for the statement in the response to Item 38.a. of Staff's Second Request?

RESPONSE:

- a. On an annual basis, the over- or under-recovery ranges from an underrecovery of 38.9% to an overrecovery of 18.5% of total uncollectible expense. By recovering the uncollectible expense for delivery service and commodity service separately, the majority of this expense will be collected on a dollar-for-dollar basis and, consequently, a smaller portion will be subject to over or under recovery.
- b. The Company's response to Staff-DR-02-038(a) was not intended to suggest that 1% is a 'threshold' for materiality. The statement that "[b]ad debt constitutes over 1% of the Company's expenses" was meant only to measure the value of bad debt expense against other expenses. As further indicated in response to Staff-DR-02-038(a), "the magnitude of the expense *combined* with the facts that the costs are volatile and outside the control of the utility" warrants treatment outside of base rate recovery.
- c. See response to Staff-DR-03-008(b).

PERSON RESPONSIBLE: William Don Wathen Jr. / Robert M. Parsons

STAFF-DR-03-009

REQUEST:

Refer to the response to Item 26 of Staff's Second Request in which Duke Kentucky provided revised schedules in the event the Commission does not approve its proposed treatment of carrying costs of gas stored underground. Provide a revised Schedule M-2.3, showing revised revenues and rates.

RESPONSE:

Please see Attachment STAFF-DR-03-009.

PERSON RESPONSIBLE: James E. Ziolkowski

SCHEDULE M-2.3 PAGE 1 OF 7 WITNESS: J. ZIOLKOWSKI

DATA: BASE PERIOD X FORECASTED PERIOD TYPE OF FILING: X ORIGINAL UPDATED REVISED WORK PAPER REFERENCE NO(S)::

LINE NO.

SERVICE: CLASS CLASS SERVICE: SERV	J. ZIOLKOWSKI	PROPOSED TOTAL	REVENUE (F + H) (1)	(<u>é</u>)	95,571,840 95,571,840	33,060,634 3,793,077 5,246,945 42,100,656	137,672,496		2,669,669 1,369,871 4,039,540 141,712,036	0 10,116 21,876 34,176 43,376	33,684 743,924	142,455,960
EXCLUDES ALL RIDERS PROPOSED ANNUALIZED REVENUE (4) (C) (C) (MCF) (MCF) (I) (D) (MCF) (I) (D) (MCF) (I) (D) (MCF) (I) (D) (I) (I) (D) (I) (I) (I) (I) (I) (I) (I) (I) (I) (I			GAS COST REVENUE(3) (H)	(\$)	49,819,246	22,445,055 2,796,514 3,844,704	78,905,519		0 0 0 78,905,519	0000	33,848 0 0 0 0 0 0 0	
EXCLUDES ALL RIDERS PROPOSED ANNUALIZED CUSTOMER BILLS(1) (MCF) (MCF		% OF REV TO	TOTAL LESS GAS COST REVENUE (G)	(%)	100.00	81.57 7.66 70.01	92.52		66.09 33.91 6.36 98.88	0.00 1.42 3.08 4.81	8	
CUSTOMER SALES(2) PROPOSE BILLS(1) (SIMOF) (C) (1073,044 6,699,903 (E) (E) (E) (IMCF) (T7,136 3,018,506 2,746 4,452 84,334 1,027,378 10,611,548 11,227,496 2,386,132 1,158,586 11,297,680 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		PROPOSED	REVENUE LESS GAS COST REVENUE(4) (F)	(\$)	45,752,594	10,615,579 996,563 1,402,241	13,014,383		2,669,669 1,369,871 4,039,540 62,806,517	0 10,116 21,876 34,176	9,528 0 600,696 0 33,684	63,516,593
CUSTOMER BILLS(1) SA (C) (1) (C) (1) (C) (1) (C) (1) (C) (1) (C) (1) (C) (1) (C)	LL RIDERS JALIZED		PROPOSED RATES (E)	(\$/MCF)	6.8288	3.5168 2.6498 2.7120	3.3271	5.5380	2.3041 1.1160 1.6929 4.8321			4,8851
CUSTOMI BILLS(1 (C) 1,07 7 7 1,14	EXCLUDES A PROPOSED ANNI		SALES(2) (D)	(MCF)	6,699,903	3,018,506 376,087 517,052	3,911,645	10,611,548	1,158,636 1,227,496 2,386,132 12,997,680	0000	4,552 0 0 0	4,552 13,002,232
RATE CLASS I CODE DESCRIPTION (A) RATE CLASS I (B) (A) RATE CLASS I (B) (A) RESIDENTIAL GS COMMERCIAL GS COMMERCIAL GS COMMERCIAL GS COMMERCIAL TOTAL RS TOTAL GS TOTAL TRANSP SERVICE TOTAL TRANSP OF GAS-INTERCO PROVISION FOR RATE REFUNDS TOTAL MISCELLANEOUS TOTAL MISCELLANEOUS			GUSTOMER BILLS(1) (C)		1,073,044	77,136	84,334	1,157,378	1,020 288 1,308 1,168,686	000		1,158,686
SALES S S S S S S S S S S	RIGINAL UPDATED NEVISED				<u>SERVICE:</u> RESIDENTIAL	TOTAL RS COMMERCIAL INDUSTRIAL	OTH PUB AUTH TOTAL GS	. SALES SERVICE	PORTATION SERVICE: GE FIRM TRANSP - LARGE INTERRUPTIBLE TRANSP SERVICE	LANEOUS REVENUES: AAYMENT CHARGES HECK CHARGES MICTION CHARGES	NECTION OF THE SEPARATION OF THE SEPARATION OF GAS-INTERCO SION FOR RATE REFUNDS	THER MISC TAL MISCELLANEOUS TOTAL COMPANY
TAT LAW AND SHEET SEELS, SHEET	FILING: X_OF APER REFEREN FORECASTED		RATE	€	1 SALES S 2 RS							23 OTHER 24 TOTAL 25 TOTA

⁽¹⁾ DETAIL CONTAINED ON SCHEDULES M-2.3, PAGES 2 THROUGH 7. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.

SCHEDULE M-2.3 PAGE 2 OF 7 WITNESS: J. ZIOLKOWSKI

PROPOSED

PROPOSED ANNUALIZED DATA: BASE PERIOD X FORECASTED PERIOD
TYPE OF FILING: X ORIGINAL UPDATED REVISED
WORK PAPER REFERENCE NO(S).:
12 MOS FORECASTED

PROPOSED	REVENUE (F + H) (I)	(\$)		32,191,320	63,380,520	95,571,840	107,304	(624,955)	94,946,885	
	GAS COST REVENUE(3) (H)	(\$)			49,819,246	49,819,246			49,819,246	
% OF REV TO	GAS COST REVENUE (G)	(%)		71.3	30.1	101.4	0.2 (1.6)	(1.4)	100.0	
PROPOSED	REVENUE LESS GAS COST REVENUE (F)	(\$)		32,191,320	13,561,274	45,752,594	107,304 (732,259 <u>)</u>	(624,955)	45,127,639	
	PROPOSED RATES (E)	(\$/MCF)		\$30.00	2.0241		\$0.10 (0.109294)			
	SALES(2) (D)	(MCF)			6.699.903	6,699,903			0000	505,550,0
	CUSTOMER BILLS(1) (C)			1,073,044		1,073,044				1,073,044
	E CLASS / DESCRIPTION (B)		RESIDENTIAL	CUSTOMER CHARGE: RESIDENTIAL TOTAL MONTHLY BILLS × : CUSTOMER CHARGE PER MONTH	COMMODITY CHARGE:	ALL CONSUMPTION	KATE KS EXCLUDING NOTH. RIDERS: HOME ENERGY ASSISTANCE PROGRAM (HEA)	DEMAND SIDE MANAGEMENT RATE (DSMR)	TOTAL RIDERS	TOTAL RATE RS RESIDENTIAL INCLUDING RIDERS
	RATE	₹	RS	CUST RESII TO	COMI					
	LINE NO.		-	0 to 4 to	φ.	7	თ ღ ე	; E	12	13

⁽¹⁾ BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.

DATA: BASE PERIOD X FORECASTED PERIOD
TYPE OF FILING: X ORIGINAL UPDATED REVISED
WORK PAPER REFERENCE NO(S)...
12 MOS FORECASTED

PROPOSED ANNUALIZED

SCHEDULE M-2.3 PAGE 3 OF 7 WITNESS: J. ZIOLKOWSKI

PROPOSED TOTAL REVENUE (F + H)	(\$)	3,663,960	29,396,674	33,060,634	0	0	33,060,634	
GAS COST REVENUE(3) (H)	(\$)		22,445,055	22,445,055			22,445,055	
% OF REV TO TOTAL LESS GAS COST REVENUE (G)	(%)	34.5	65.5	100.0	0.0	0.0	100.0	
PROPOSED REVENUE LESS GAS COST REVENUE (F)	(\$)	3,663,960	6,951,619	10,615,579	0	0	10,615,579	
PROPOSED RATES (E)	(\$/MCF)	\$47.50	2.3030		0.000000			
SALES(2)	(MCF)		3,018,506	3,018,506			3,018,506	
CUSTOMER BILLS(1) (C)		77,136		77,136			77,136	S. 35816/MCF,
CLASS / DESCRIPTION (B)	COMMERCIAL	ISTOMER CHARGE: NN-RESIDENTIAL TOTAL MONTHLY BILLS x : CUSTOMER CHARGE PER MONTH	MMMODITY CHARGE: ALL CONSUMPTION	RATE GS COMMERCIAL EXCLUDING RIDERS	RIDERS: DEMAND SIDE MANAGEMENT RATE (DSMR)	irs	TOTAL RATE GS COMMERCIAL INCLUDING RIDERS	(1) BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.
RATE CODE (A))) S9	CUSTOMER CHARGE: NON-RESIDENTIAL TOTAL MONTHLY B CUSTOMER CHARG	COMMODITY CHARGE: ALL CONSUMPTION	RATE GS CC	RIDERS: DEMAND SIC	TOTAL RIDERS	TOTAL RATE	(1) BILLS TH (2) REFLECT (3) REFLECT
LINE NO.	-	0 to 4 to	9 1	80	9 01	5	12	

CASE NO. 2009-00202 ANNUALIZED TEST YEAR REVENUES AT PROPOSED VS. MOST CURRENT RATES FOR THE TWELVE MONTHS ENDED JANUARY 31, 2011 (GAS SERVICE) DUKE ENERGY KENTUCKY

PROPOSED ANNUALIZED

SCHEDULE M-2.3 PAGE 4 OF 7

J. ZIOLKOWSKI

WITNESS:

DATA: ____ BASE PERIOD _X_FORECASTED PERIOD ___ TYPE OF FILING: _X_ORIGINAL ___ UPDATED ____ REVISED work PAPER REFERENCE NO(S).: 12 MOS FORECASTED

3,793,077 130,435 3,662,642 3,793,077 PROPOSED TOTAL REVENUE (F + H) (£) 2,796,514 2,796,514 2,796,514 GAS COST REVENUE(3) (\$ 100.0 0.0 86.9 100.0 0.0 13.1 % OF REV TO TOTAL LESS GAS COST REVENUE <u>(9</u> (%) PROPOSED REVENUE LESS GAS COST REVENUE (F) 996,563 130,435 866,128 996,563 9 0.00000.0 \$47.50 2.3030 PROPOSED (\$/MCF) RATES Œ, 376,087 376,087 376,087 SALES(2) (MCF) <u>@</u> 2,746 2,746 2,746 CUSTOMER BILLS(1) _Ω TOTAL RATE GS INDUSTRIAL INCLUDING RIDERS DEMAND SIDE MANAGEMENT RATE (DSMR) RATE GS INDUSTRIAL EXCLUDING RIDERS CLASS / DESCRIPTION CUSTOMER CHARGE PER MONTH <u>@</u> NON-RESIDENTIAL TOTAL MONTHLY BILLS x ALL CONSUMPTION COMMODITY CHARGE: INDUSTRIAL CUSTOMER CHARGE: TOTAL RIDERS RIDERS: RATE B gs 7 12 ە 6 œ 2 9 ~ 를 <u>6</u>

⁽¹⁾ BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.

SCHEDULE M-2.3 PAGE 5 OF 7 WITNESS: J. ZIOLKOWSKI

DATA: BASE PERIOD X FORECASTED PERIOD TYPE OF FILING: X ORIGINAL UPDATED REVISED WORK PAPER REFERENCE NO(S).:

PROPOSED ANNUALIZED

12 INOS I ONESAS ES				でおくてくらにし かがんくうしょだい					
						PROPOSED	% OF REV TO		TOTAL
LINE NO.	RATE	CLASS / DESCRIPTION	CUSTOMER BILLS(1) (C)	SALES(2) (D)	PROPOSED RATES (E)	REVENUE LESS GAS COST REVENUE (F)	GAS COST REVENUE (G)	GAS COST REVENUE(3) (H)	REVENUE (F + H) (1)
	&			(MCF)	(\$/MCF)	(\$)	(%)	(\$)	(\$)
-	0 89	OTHER PUBLIC AUTHORITIES							
2	CUSTOMER CHARGE:	CHARGE:							
w 4 r	NON-RESIDENTIAL TOTAL MONTHL	ON-RESIDENTIAL TOTAL MONTHLY BILLS x : CISTOMER CHARGE PER MONTH	4,452		\$47.50	211,470	15.1		211,470
0				,		1 190 771	84.9	3,844,704	5,035,475
9 1-	ALL CONSUMPTION	ALL CONSUMPTION		517,052	7.3030			701	5 246 945
. 60	RATE GS O	RATE GS OPA EXCLUDING RIDERS	4,452	517,052		1,402,241	100.0	3,844,704	
σ	RIDERS:				0.000000	0	0.0		0
10	DEMAND S	DEMAND SIDE MANAGEMENT RATE (DSMK)				0	0.0		0
7-	TOTAL RIDERS	ERS				1 400 244	100.0	3,844,704	5,246,945
12		TOTAL RATE GS OPA INCLUDING RIDERS	4,452	517,052		1 +2,20+,1			

⁽¹⁾ BILLS THAT TERMINATE IN RESPECTIVE RATE STEPS. (2) REFLECTS NORMALIZED VOLUMES. (3) REFLECTS AVERAGE EXPECTED GAS COST OF \$7.435816/MCF.

SCHEDULE M-2.3 PAGE 6 OF 7 WITNESS: J. ZIOLKOWSKI

DATA: ____ BASE PERIOD _X_FORECASTED PERIOD ____ TYPE OF FILING: _X_ ORIGINAL ____ UPDATED ____ REVISED WORK PAPER REFERENCE NO(S).: 12 MOS FORECASTED

NO.

APE	APER REFERENCE NO(S).: FORFCASTED			PROPOSED ANNUALIZED	ALIZED				0100000
5						PROPOSED DEVENIE LESS	% OF REV TO TOTAL LESS		TOTAL PEVENIE
	RATE CODE (A)	CLASS / DESCRIPTION (B)	CUSTOMER BILLS(1) (C)	SALES(2) (D) (MCF)	PROPOSED RATES (E) (\$/MCF)	REVENUE (F)	GAS COST REVENUE (G) (%)	GAS COST REVENUE(3) (H) (\$)	(\$)
4- 14	FT - LARGE FIRM TRANSPORTATION - LARGE	N - LARGE			\$430.00	438,600	16.6		438,600
ო	ADMINISTRATIVE CHARGE	(GE	1,020				370		2,231,069
4 ග	TRANSPORTATION CHARGE: ALL CONSUMPTION	ARGE:		1,158,636	1.9256	2,231,069	101.3		2,669,669
9	RATE FT-LARGE EXCLUDING RIDERS	UDING RIDERS	1,020	20,001,1					
7	RIDERS:				(0.0290)	(33,600)	(1.3)		(33,600)
œ	GAS COST ADJUSTME	GAS COST ADJUSTMENT TRANSITION (GCAT)				(33,600)	(1.3)		(33,600)
ø	TOTAL RIDERS			4 4 636		2,636,069	100.0		2,636,069
10	TOTAL RATE FT - LAF	TOTAL RATE FT - LARGE INCLUDING RIDERS	020,r						

(1) REFLECTS NORMALIZED VOLUMES.

SCHEDULE M-2.3 PAGE 7 OF 7 WITNESS: J. ZIOLKOWSKI

DUKE ENERGY KENTUCKY CASE NO. 2009- 00202 ANNUALIZED TEST YEAR REVENUES AT PROPOSED VS. MOST CURRENT RATES FOR THE TWELVE MONTHS ENDED JANUARY 31, 2011 (GAS SERVICE)

PROPOSED ANNUALIZED

DATA: BASE PERIOD X FORECASTED PERIOD TYPE OF FILING: X ORIGINAL UPDATED REVISED WORK PAPER REFERENCE NO(S).: 12 MOS FORECASTED

1,369,871 123,840 1,246,031 PROPOSED TOTAL REVENUE (F + H) (S) GAS COST REVENUE(3) (H) (3) 100.0 91.0 9.0 % OF REV TO TOTAL LESS GAS COST REVENUE (g 8 1,246,031 PROPOSED REVENUE LESS GAS COST REVENUE 123,840 1,369,871 Ē 8 1.0151 \$430.00 PROPOSED RATES (\$/MCF) Œ 1,227,496 1,227,496 SALES(2) (MCF) <u>@</u> 288 288 CUSTOMER BILLS(1) 0 CLASS / DESCRIPTION INTERRUPTIBLE TRANSPORTATION TOTAL RATE IT TRANSPORTATION <u>(B</u> ADMINISTRATIVE CHARGE COMMODITY CHARGE: ALL CONSUMPTION RATE CODE (A) 9 4 տ N S S

STAFF-DR-03-010

REQUEST:

Refer to the response to Item 27 of Staff's Second Request, which states that Duke Kentucky sells all of its accounts receivable at a discount. Does this mean that Duke Kentucky sells its accounts receivable before any portion becomes uncollectible? If yes, explain why Duke Kentucky records any uncollectible expense on its books since, once they are sold, it no longer owns the accounts receivable. If no, identify and describe the time frame in which the accounts receivable are sold.

RESPONSE:

Duke Energy Kentucky sells its accounts receivable at a discount, before any portion becomes uncollectible. Because the discount includes, among other things, a component based on the Company's history of net charge-offs (*i.e.*, bad debt), an estimate of the bad debt expense associated with the sold receivables is charged to Uncollectible Expense (Account 904) at the time of the sale.

PERSON RESPONSIBLE: Robert M. Parsons

STAFF-DR-03-011

REQUEST:

Refer to the response to Item 30 of Staff's Second Request.

- a. Confirm that Schedules M-2.2 and M-2.3 attached to this response are the same schedules filed in the application and not revised schedules.
- b. Refer to the revised schedules filed in the electronic version of this response. The change in Mcfs sold in these schedules results in revised revenues. Provide the revised rates, based on the change in Mcfs, that are needed to collect the revenue requirement proposed in the application.

RESPONSE:

a. Yes. Schedules M-2.2 and M-2.3 attached in response to Staff-DR-02-030 are the same schedules filed in the Company's original application and not the revised schedules provided in the electronic version to the response.

b.

	Propo	sed
Rate	Customer Chg	MCF Charge
RS	\$30.00	\$1.7899
GS	\$47.50	\$2.1112
FT-L	\$430.00	\$1.8810
IT	\$430.00	\$1.0126

PERSON RESPONSIBLE: James E. Ziolkowski

	•		
		*	

STAFF-DR-03-012

REQUEST:

Refer to the response to Item 31 of Staff's Second Request. The change in Mcfs sold in these schedules results in revised revenues. Provide the revised rates, based on the change in Mcfs, that are needed to collect the revenue requirement proposed in the application.

RESPONSE:

		Propos	sed
Rate	Cu	stomer Chg	MCF Charge
	Li.		
RS		\$30.00	\$1.6607
GS		\$47.50	\$2.0009
FT-L		\$430.00	\$1.8642
IT		\$430.00	\$1.0100

PERSON RESPONSIBLE: James E. Ziolkowski

STAFF-DR-03-013

REQUEST:

Refer to the response to Item 32.b. of Staff's Second Request.

- a. Explain whether the response means Mr. Spanos' consideration of "estimates for other gas companies" in developing estimated net salvage percentages, as per page 12 of his direct testimony, extended to all of the 51 studies identified in the attachment to the response or just to selected studies among those identified.
- b. If Mr. Spanos considered selected studies among those identified in the attachment, identify which of the 51 studies were considered. If his consideration of the "estimates for other gas companies" included the results of all 51 studies, explain in detail how he gave consideration to each individual study.

RESPONSE:

- a. Consideration of estimates for other gas companies per page 12 of Mr. Spanos' direct testimony extended to all of the 51 studies identified in the attachment, as well as studies performed prior to these 51 studies by Gannett Fleming, in addition to Mr. Spanos's knowledge of other gas studies performed since 1986.
- b. All studies were considered. Each individual study was reviewed for comparability or similarity to Duke Energy Kentucky, and then judgmentally emphasized when making the determination for each account of Duke Energy Kentucky.

PERSON RESPONSIBLE: John J. Spanos

STAFF-DR-03-014

REQUEST:

The response to Item 34.a. of Staff's Second Request, which indicates that attempting to calculate depreciation rates based on actual experience is not realistic "because outlier data could skew results for the future estimate," is not acceptable. Provide the information requested in Item 34.a., along with any explanation, caveat, etc., that is necessary to explain how the results might be skewed by the outlier data.

RESPONSE:

Determining a net salvage percent cannot be a statistical exercise because there are many one-time occurrences that do not properly represent future expectations. Thus, an actual experience net salvage estimate would be a blind assumption result.

This request does not clarify what actual period of time experience for each account is being required. In order to complete this request it has been determined the overall available data for each account was requested, not the most recent five-year average, or any shorter periods of time. The attached schedule sets forth the depreciation rates using the actual experienced net salvage percent. The actual net salvage percent can be found on pages III-132 to III-159 of the depreciation study.

Account 1900 can be used to illustrate how actual historical data should not be used without some degree of judgment. As shown on page III-132, the actual net salvage percent is negative 29 percent. This data includes cost of removal amounts in 1990 and 1995 which do not have a clearly identified retirement associated with the cost. Other examples would be Accounts 204.1 and 274.1, with net salvage percents of positive 485 percent and negative 303 percent, respectively. It is not realistic to estimate a depreciation rate that assumes for every dollar you invest, you will be given back \$4.85 and not collecting anything.

PERSON RESPONSIBLE: John J. Spanos

DUKE ENERGY KENTUCKY DUKE SALVAGE, ORIGINAL COST, BOOK RESERVE AND CALCULATED SUMMARY OF ESTIMATED SURVIVOR CURVES, NET SALVAGE, ORIGINAL COST, BOOK RESERVE AND CALCULATED ANNUAL DEPRECIATION RATES AS OF DECEMBER 31, 2008

COMPOSITE	REMAINING LIFE (9)=(6)((7)	13.6	27.2 3.5 24.7 19.0	5.5	13.2 11.5 15.0	38.3	24.7	30.2 32.0	, ,	32.4 43.7	32.0	23.8		9 21.1 2 26.0	69	
)/(4)	7.03	5.10 4.37 9.51 3.84 5.02	13.09	5.66 7.04 5.58	. 0.40	2.56	11.82		5.98 2.17 2.24	1.95	2.79	1.92	3.09 3.39 3.72	3.69	
1	CALCULATED ANNUAL ACCRUAL RAD (7) (8)=(7)	42,286	129,787 282 170,968 206 301,243	52,689	217,660 801	0	6,231 107,022 113,253	128,130	200,1	83,392 1,513,919	463,190	98,238	16,568	83,252 125,237 3,047,838	3,256,327	
	FUTURE ACCRUALS (6)	573,392	5,113,829 7,681 593,658 5,091	5,720,259 118,470 10,705	(39,879) 2,866,915 9,217 9,259,079	(418 527)	2,042,262 2,642,262 2,762,554	3,864,665	33,697	874,042 49,106,346	113,258,712	178,		1,392,490	1 -	
1BER 31, 2008	BOOK RESERVE (5)	28,121	287,692 636 1,725,590	2,015,756	(4,3,14) 80,977 1,018,290 2,155 3,412,019		24,439 1,391,245 1,906,906 3,322,590	770 303	124,818	687,267		۲G	378,707 378,707 501,574			
JRVIVOR CURVES, NET SACTES AS OF DECEMBER 31, 2008 ANNUAL DEPRECIATION RATES AS	ORIGINAL COST (4)	604 FJ 093	4,187,225,32 6,447,49 1,797,869,71	5,996,913.98	5,562.77 178.694.30 3,846,737.98 11,371.92 11,043,349.72		24,438.55 1,567,399.78 4,173,547.35 5,765,355,68		1,084,353.52	1,394,028.67	69,705,083.01 115,457,749.96 23,784,983.14	210,341,844.78	ř		3,689,115,08 81,975,187,55 88,360,195,66	
IVOR CURVES NUAL DEPRE(NET SALVAGE PERCENT		0 (29) (29) (29)	(53)	2 75 77 (1) 0		485 (4) (9)		(303)	o ;	(21)	(42)	(15)		(23)	
IMATED SURV AN	SURVIVOR SURVIE (2)		20-S0.5 100-R1 100-R1 100-R1	40-R1	20-SQ 20-SQ 25-SQ 15-SQ 15-SQ		50-SQ 50-R4 40-S1.5		65-R4	50-R2.5	41-R2.5 55-R2.5 60-R2.5	55-R2.5	40-R1.5	20-S1.5 53-R2	35-R1.5 38-R1.5 42-R1.5	
SUMMARY OF ESTIMATED SURVIVOR CURVES, NE. SUMMARY OF ESTIMATED SURVIVOR CURVES.	SUR ACCOUNT	DEPRECIABLE PLANT	SED MPROVEMENTS WATHONS CENTER MOTE BUILD DING	FLORENCE SERVICE BUILDING - 19TH & AUGUSTINE KENTUCKY SERVICE BUILDING - 19TH & AUGUSTINE MINOTURES & IMPROVEMENTS	1910 OFFICE FURNITURE AND EQUIPMENT 1930 STORES AND EQUIPMENT 1940 TOOLS, SHOP AND GARAGE EQUIPMENT 1940 COMMUNICATION EQUIPMENT 1970 AND MISCELLANEOUS EQUIPMENT	0	PRODUCTION PLANT 2041 RIGHTS OF WAY 2050 STRUCTURES AND IMPROVEMENTS 2050 LYOUND PETROLEUM GAS EQUIPMENT	2110 LIGGIS TITLE TOTAL PRODUCTION PLANT	TND IS NOTE INTERPO	DISTRIBUTION - GENERAL 2741 RIGHTS OF WAY - GENERAL 2750 STRUCTURES AND IMPROVEMENTS - GENERAL 2750	MAINS 2761 CAST IRON, COPPER AND ALL VALVES	2762 STEEL 2763 PLASTIC 2765 STEEL - FEEDER LINES	TOTAL MAINS	2780 M & R - GENERAL - SYSTEM - EXCL. ELECT. ELECTRONIC EQUIPMENT 2781 M & R - GENERAL - SYSTEM - ELECTRONIC EQUIPMENT 2781 MEASURING & REGULATING - GENERAL - DISTRICT 2782 MEASURING & REGULATING - GENERAL - DISTRICT	SERVICES 2801 CAST IRON, COPPER AND VALVES 2802 STEEL 2803 PLASTIC	TOTAL SERVICES

DUKE ENERGY KENTUCKY SUMMARY OF ESTIMATED SURVIVOR CURVES, NET SALVAGE, ORIGINAL COST, BOOK RESERVE AND CALCULATED ANNUAL DEPRECIATION RATES AS OF DECEMBER 31, 2008

COMPOSITE REMAINING LIFE (9)=(6)((7)	17.0 27.8 21.5 29.8 29.5 33.5 10.1 10.1 16.2 32.1	9.8.4.4.7.7.7.7.7.7.7.7.7.7.7.7.7.7.7.7.7
TED CRUAL RATE (8)=(7)/(4)	3.42 2.90 2.77 2.07 2.07 2.07 2.22 6.01 5.53 3.60	3.77 0.30 3.76 5.13 3.60
CALCULATED ANNUAL ACCRUAL AMOUNT (7) (8)=(7)	178,538 116,586 118,696 132,029 44,980 76,454 31,777 93,854 9,758 3,892 5,981 1,096	868 290 67,957 6,439 75,554 9,842,977
FUTURE ACCRUALS (6)	3,027,078 4,468,088 2,553,547 3,934,949 1,124,327 2,452,525 938,178 3,142,533 187,997 39,225 31,938 17,791	8.539 1.274 861.961 (17.944) 99.800 953,630 303,310,795
BOOK RESERVE (5)	1,770,556 619,688 1,648,044 546,001 700,596 228,898 585,119 275,975 295,747 32,044 76,146 12,620	14,470 85,268 892,189 47,221 34,550 1,073,698 100,817,358
ORIGINAL COST (4)	5,214,819,32 5,530,190,56 4,287,338,93 4,572,396,83 2,172,527,71 3,192,171,22 1,538,685,79 3,453,038,38 4,39,685,18 6,730,82 108,033,69 30,411,24	23,008.38 96,157.81 1,808.402.82 47,220.92 125,560.68 2,100,350.61 354,469,613.97 117,711.07 42,228.92 314,188.17
NET SALVAGE PERCENT (3)	8 8 7 7 1 1 1 1 1 0 0 0 0 0	0 0 0 6 8 E
SURVIVOR CURVE (2)	37-R3 39-R2.5 39-S2.5 39-S2.5 43-R2.5 48-R2 48-R2 35-R2 20-R2.5 15-L3 30-S2.5	20-SQ 11-R2 25-SQ 11-R2.5 20-SQ
ACCOUNT (1)	2810 METERS 2811 METERS - LEASED 2820 METER INSTALLATIONS 2821 METER INSTALLATIONS - LEASED 2830 HOUSE REGULATORS - LEASED 2831 HOUSE REGULATORS - LEASED 2840 HOUSE REGULATOR INSTALLATIONS 2841 HOUSE REGULATOR INSTALLATIONS 2840 HOUSE REGULATOR INSTALLATIONS 2841 HOUSTRIAL MEAS. & REG. STATION EQUIP 2850 INDUSTRIAL MEAS. & REG. STATION EQUIP 2871 OTHER EQUIPMENT - STREET LIGHTING 2870 OTHER EQUIPMENT - STREET LIGHTING	GENERAL PLANT 2910 OFFICE FURNITURE AND EQUIPMENT 2921 TRAILERS 2940 TOOLS, SHOP AND GARAGE EQUIPMENT 2960 MISCELLANEOUS EQUIPMENT 2960 MISCELLANEOUS EQUIPMENT TOTAL GENERAL PLANT TOTAL DEPRECIABLE PLANT TOTAL DAND LAND RIGHTS 2040 LAND AND LAND RIGHTS 2040 LAND AND LAND RIGHTS 2740 LAND AND LAND RIGHTS 2740 LAND AND LAND RIGHTS 2750 LAND AND LAND RIGHTS TOTAL NONDEPRECIABLE PLANT TOTAL COMMON AND GAS PLANT

• Curve shown is interim survivor curve. Each facility in the account is assigned an individual probable retirement year.

STAFF-DR-03-015

REQUEST:

Refer to the response to Item 36.a. of Staff's Second Request. Based on the information being provided in response to the request item immediately preceding this item, which concerns Item 34.a. of Staff's Second Request, provide a revised response to Item 36.a. of Staff's Second Request.

RESPONSE:

See attachment Staff-DR-03-015.

PERSON RESPONSIBLE: Robert M. Parsons

DUKE ENERGY KENTUCKY, INC.
CASE NO. 2009-00202
DEPRECIATION AND AMORTIZATION ACCRUAL RATES AND
JURISDICTIONAL ACCUMULATED BALANCES BY ACCOUNTS,
FUNCTIONAL CLASS OR MAJOR PROPERTY GROUP
THIRTEEN MONTH AVERAGE AS OF JANUARY 31, 2011

MANUFACTURED GAS PRODUCTION PLANT

DATA: BASE PERIOD "X" FORECASTED PERIOD TYPE OF FILING: "X" ORIGINAL UPDATED REVISED WORK PAPER REFERENCE NOS.: SCHEDULE B-2.1, SCHEDULE B-3

SCHEDULE B-3.2 PAGE 1 OF 4 WITNESS RESPONSIBLE: B. R. MELENDEZ

90		אָלָה ק		(٢)			50 SQ	50 R4		40 v.:.			
Averac	Alot Sound		Salvage Life	(H) (U)		etual Life	0 485.00%	-4 00%	2000	-a.uu%			
Calculated				(G=DxF)	ь	0 Perp	0 46	2 194	100	38,313			40,507
pasocood	nacodo:		Rate	(£		0.00%	0.00% (2)	0.40%	201	2.56%			
sdiction	מומחם	Accumulated	Balance	Œ	es	0	8.554	700 000	103,634	710,603	0		1,208,452
Adjusted Jurisdiction	C I I I I	Plant	Investment (1)	(Q)	ь	41.199	8.554	078 670	040,073	1,496,617	0		2,094,949
- 10 The second of the second	Account Title	or Major	Property Grouping	(C)		and and Biotic	Diahts of Max	Nighta of way	Structures & Improvements	Liquefied Petroleum Gas Equipment	Retirement Work In Progress		Total Manufactured Gas Production Plant
	Company	Acct.	S	. (c. a)	75.5	00400	20400	20407	20500	21100	108		
	FERC	Acct	o Z	. (700	400	400	302	311		-	
		Line	2	į	Ç.	•	- (7	က	4	2		မ

⁽¹⁾ Plant Investment includes Completed Construction Not Classified (Account 106). (2) This account is fully depreciated.

DUKE ENERGY KENTUCKY, INC. CASE NO. 2009-00202 DEPRECIATION AND AMORTIZATION ACCRUAL RATES AND JURISDICTIONAL ACCUMULATED BALOES BY ACCOUNTS, FUNCTIONAL CLASS OR MAJOR PROPERTY GROUP THIRTEEN MONTH AVERAGE AS OF JANUARY 31, 2011

DISTRIBUTION PLANT

DATA: BASE PERIOD "X" FORECASTED PERIOD TYPE OF FILING: "X" ORIGINAL UPDATED REVISED WORK PAPER REFERENCE NOS.: SCHEDULE B-2.1, SCHEDULE B-3

SCHEDULE B-3.2 PAGE 2 OF 4 WITNESS RESPONSIBLE. B. R. MELENDEZ

	FERC	Company	Account Title	Adjusted J 13-Month	Adjusted Jurisdiction 13-Month Average	Proposed	Calculated		Average	
Line	Acct.	Acct.	or Major	Plant	Accumulated	Accrual	Depr/Amort	% Net	Service	Curve
Š	o N	No.	Property Grouping	Investment (1)	Balance	Rate	Expense	Salvage	Life	Form
€	(B-1)	(B-2)	(C)	(D)	(E)	(F)	(G=DxF)	(H	(1)	(7)
				জ	G		υs			
*	374	27400	Land and Land Rights	36,319	0	0	0	Perpetual Life		
2	374	27401	Rights of Way	827,989	387,605	11.82%	97,868	-303.00%	65	R4
ന	375	27500	Structures & Improvements	123,687	93,047	0.66%	816	0.00%	20	R2.5
4	376	27601	Mains - Cast Iron & Copper	1,123,679	426,857	5.98%	67,196	-12.00%	41	R2.5
S	376	27602,27607	Mains - Steel	71,121,151	30,643,186	2.17%	1,543,329	-12.00%	55	R2.5
9	376	27603,27608	Mains - Plastic	139,828,676	21,268,933	2.24%	3,132,162	-12.00%	9	R2.5
7	376	27605	Mains - Feeder	19,298,783	7,504,886	1.95%	376,326	-12.00%	55	R2.5
ω	378	27800	System Meas, & Reg. Station Equipment	3,717,957	1,498,452	2.79%	103,731	-15.00%	40	R1.5
თ	378	27801	System Meas. & Reg. Station Equipment-Elec	554,956	279,528	4.61%	25,583	-15.00%	20	S1.5
10	378	27802	District Regulating Equipment	1,107,447	560,529	1.92%	21,263	-24.00%	53	R2
11	380	28001	Services- Cast Iron & Copper	1,426,830	1,663,531	3.09%	44,089	-23.00%	35	R1.5
12	380	28002,28004	Services-Steel	4,009,714	1,776,372	3.39%	135,929	-23.00%	38	R1.5
13	380	28003,28005-28007	Services-Plastic	95,825,728	22,949,898	3.72%	3,564,717	-23.00%	42	R1.5
14	381	28100,28101	Meters	11,222,089	2,281,068	3.16%	354,618	8.00%	37	R3
15	382	28200,28201	Meter Installations	9,783,936	2,655,717	2.83%	276,885	2.00%	38	S2.5
16	383	28300,283001	House Regulators	6,204,716	1,188,017	2.26%	140,227	16.00%	43	R2.5
17	384	28400,28401	House Regulator Installations	6,329,715	1,124,944	2.52%	159,509	1.00%	48	RZ
18	385	28500	Large Industrial Meas. & Reg. Equipment	439,685	318,166	2.22%	9,761	-10.00%	35	R2
19	385	28501	Large Industrial Meas. & Reg. Equipment - Comm	64,791	34,686	6.01%	3,894	-10.00%	20	R2.5
20	387	28700	Other Equipment - Other	108,084	94,576	5.53%	5,977	0.00%	15	ខ
21	387	28701	Street Lighting Equipment	30,411	14,408	3.60%	1,095	0.00%	30	\$2.5
22			Asset Retirement Obligation	1,014,039	460,509					
23		108	Retirement Work in Progress		(1,211,740)					
			A STATE OF THE PARTY OF THE PAR							
24			Total Distribution Plant	374,200,382	96,013,175		10,064,975			

⁽¹⁾ Plant Investment includes Completed Construction Not Classified (Account 106).

DUKE ENERGY KENTUCKY, INC.
CASE NO. 2009-00202
DEPRECIATION AND AMORTIZATION ACCRUAL RATES AND
JURISDICTIONAL ACCUMULATED BALANCES BY ACCOUNTS,
FUNCTIONAL CLASS OR MAJOR PROPERTY GROUP
THIRTEEN MONTH AVERAGE AS OF JANUARY 31, 2011

GENERAL PLANT

SCHEDULE B-3.2 PAGE 3 OF 4 WITNESS RESPONSIBLE: B. R. MELENDEZ

DATA: BASE PERIOD "X" FORECASTED PERIOD TYPE OF FILING: "X" ORIGINAL UPDATED REVISED WORK PAPER REFERENCE NOS.: SCHEDULE B-2.1, SCHEDULE B-3

				Adjusted Jurisdiction	risdiction					
	FERC	Company	Account Title	13-Month Average	Average		Calculated		Average	
Line	Acct.	Acct.	or Major	Plant	Accumulated	_	Depr/Amort	% Net	Service	Curve
Š.	No.	No.	Property Grouping	Investment (1)	Balance		Expense	Salvage	Life	Form
€	(B-1)	(B-2)) (O)	(<u>0</u>)	(E)		(G=DxF)	(H)	0	(7)
	***************************************			s	w		ь			
 -		20300	Miscellaneous Intangible Plant	497,352	414,571		47,964	47,964 Amortized over 60 months	er 60 months	
2	391	29100	Office Furniture & Equipment	12,509	10,198	3.77%	472	0.00%	20	SQ
ო	392	29200	Transportation Equipment	0	777			Depr. Charge	ed to Transp.	=xpense
4	392	29201	Trailers	96,158	86,921			Depr. Charge	ed to Transp.	Expense
ĸ	394	29400	Tools, Shop & Garage Equipment	2,655,721	1,035,255	3.76%	99,855	3.00% 25 SQ	25	SQ
9	396	29600	Power Operated Equipment	47,221	47,221	(2)		Depr. Charge	ed to Transp.	Expense
Ž	398	29800	Miscellaneous Equipment	o	0	5.13%	0	-7.00%	20	SQ
ω		108	Retirement Work in Progress		0					
		the state of the s								
σ			Total General Plant	3,308,961	1,594,943		148,291			
10			Total Gas Plant	379,604,292	98,816,570		10,253,773			
		- Contraction of the Contraction								

Plant Investment includes Completed Construction Not Classified (Account 106).
 This account is fully depreciated.

DUKE ENERGY KENTUCKY, INC.
CASE NO. 2009-00202
DEPRECIATION AND AMORTIZATION ACCRUAL RATES AND JURISDICTIONAL ACCUMULATED BALANCES BY ACCOUNTS, FUNCTIONAL CLASS OR MAJOR PROPERTY GROUP THIRTEEN MONTH AVERAGE AS OF JANUARY 31, 2011

COMMON PLANT

DATA: BASE PERIOD "X" FORECASTED PERIOD TYPE OF FILING: "X" ORIGINAL UPDATED REVISED WORK PAPER REFERENCE NOS.: SCHEDULE B-2.1, SCHEDULE B-3

SCHEDULE B-3.2 PAGE 4 OF 4 WITNESS RESPONSIBLE: B. R. MELENDEZ

	Curve	(7)	S0.5	£ 8	3 8 8 8 8 8	8 8 8 8 8						
	Average Service Life	0	50		20 25	1						
	% Net Salvage	Œ	0.00%	-29.00%	75.00%	-1.00%						
	Calculated Depr/Amort Expense	(G=DxF)	2,460,612 42,286	406,770 52,695	1,946 0	278,533 801		3,243,643		834,914	11 088 601	100,000,11
	Proposed Accrual Rate	(4)	Various 7.03%	5.02% 13.09%	34.98%	5.66% 7.04%						
Adjusted Jurisdiction	Average Accumulated Balance	S	16,201,255 81,549 0	2,817,468	(5,039)	2,052,569 3,352 (178,104)		21,466,464		0,020,400	104,342,038	
Adjusted	13-Month Average Plant Accumu Investment (1) Bala	s	22,071,145 601,513 154,248	8,102,991 402,556 5,553	178,694	11,372		30,449,136	9,382,013		388,986,305	
Account Title	or Major Property Grouping (C)		Miscellaneous Intangible Plant Leased AMI Meters Land and Land Rights Stuctures & Improvements	Office Furniture & Equipment Stores Equipment	Tools, Shop & Garage Equipment	Miscellaneous Equipment Retirement Work in Progress	Total Common Plant		Common Plant Allocated to Gas 25.74% Original Cost 25.74% Reserve	23.74% Annual Provision	Total Gas Plant Including Allocated Common	
Company	Acct. No. (B-2)	000	17001 18900 19000	19100	19700	108			25.74	79.74		
FERC	Acct. No. (B-1)											
-	No. (A)	-	. U W 4 1	n ω r	- co o	10	#		2 t t 4		15	

⁽¹⁾ Plant investment includes Completed Construction Not Classified (Account 106).

STAFF-DR-03-016

REQUEST:

Refer to the response to Item 39 of Staff's Second Request. Provide Duke Energy Ohio's tariffs for its uncollectible expense recovery mechanisms and a description of any differences between what was authorized and what it had proposed.

RESPONSE:

The Company has a pending application before the Public Utilities Commission of Ohio, Case No. 09-773-GA-UEX, to establish its initial Rider UE-G (Uncollectible Expense – Gas) at \$0.01569 per CCF. See Attachment STAFF-DR-03-016.

PERSON RESPONSIBLE: William Don Wathen Jr.

Case No. 2009-00202 Attachment Staff-DR-03-016 Page 1 of 1

Duke Energy Ohio 139 East Fourth Street Cincinnati, Ohio 45202 P.U.C.O. Gas No. 18 Sheet No. 67.2 Cancels and Supersedes Sheet No. 67.1 Page 1 of 1

RIDER UE-G

UNCOLLECTIBLE EXPENSE RIDER

APPLICABILITY

Applicable to all sales service and transportation customers.

DESCRIPTION

This rider enables the recovery of costs associated with uncollectible accounts arising from those customers responsible for paying the Uncollectible Expense Rider. The Company shall file an application with the Public Utilities Commission of Ohio if the Company determines that an adjustment of more than plus or minus ten (10) percent is needed to adjust for prior period over or under-collections.

MONTHLY CHARGE

A charge of \$0.01569 per CCF shall be applied to all gas volumes delivered to customers in the customer classes noted above.

SERVICE REGULATIONS

The supplying and billing for service and all conditions applying thereto, are subject to the jurisdiction of the Public Utilities Commission of Ohio, and to the Company's Service Regulations currently in effect, as filed with the Public Utilities Commission of Ohio.

Filed pursuant to an Order dated Commission Ohio.	in Case No	before the Public Utilities
Issued:		Effective:

Issued by Julie Janson, President

STAFF-DR-03-017

REQUEST:

Refer to the response to Item 41 of Staff's Second Request. The request asked for the monthly value of Duke Kentucky's gas stored underground for the years 2004 through 2008 plus the first six months of 2009. However, the response includes monthly values only for 2009. Provide the information originally requested.

RESPONSE:

Month	<u>2004</u>	<u>2005</u>	<u> 2006</u>	2007	<u> 2008</u>	<u> 2009</u>
January	\$3,537,068	\$4,105,216	\$7,556,687	\$7,398,752	\$5,552,009	\$6,757,148
February	2,600,229	2,634,404	5,293,877	3,694,740	3,533,702	4,748,954
March	2,548,797	1,800,566	3,548,046	2,690,187	2,161,134	2,308,330
April	3,379,377	2,799,661	4,241,734	3,588,974	3,671,325	2,892,430
May	4,482,818	4,144,503	5,290,566	5,434,511	6,220,541	4,246,504
June	5,455,577	5,077,318	6,471,349	6,732,590	8,030,037	5,580,415
July	6,354,738	6,536,169	7,646,480	7,941,132	9,997,265	6,565,241
August	7,712,888	7,836,311	9,447,780	9,329,584	11,646,339	7,463,141
September	8,292,838	8,952,247	10,566,300	9,837,605	12,940,265	
October	7,775,527	9,909,507	10,436,072	10,575,772	13,206,988	
November	7,244,493	10,255,094	10,053,553	9,427,453	12,389,900	
December	6,102,597	8,509,260	8,916,835	7,776,574	9,751,067	

PERSON RESPONSIBLE: William Don Wathen Jr.



STAFF-DR-03-018

REQUEST:

Refer to the response to Item 42 of Staff's Second Request. Explain whether the approved rates and the phase-in of the shift to MSFV rate design were proposed by Duke Energy Ohio or if they were imposed by the Ohio Commission.

RESPONSE:

In Duke Energy Ohio's most recent gas rate application, the Company proposed to implement a decoupling rider (Rider SD) as a means of severing the relationship between the Company's earnings and volumetric sales. In its Staff Report, the Staff of the Public Utilities Commission of Ohio recommended adoption of a 'modified straight fixed-variable' rate design in lieu of the Company's proposed decoupling rider.

The Company and most parties involved in the proceeding agreed to adopt the modified straight-fixed variable approach in a stipulation which was approved by the Ohio Commission.

PERSON RESPONSIBLE: William Don Wathen Jr.

STAFF-DR-03-019

REQUEST:

Mr. Ziolkowski's testimony, on page 8, states that a larger customer charge will, among other things, mitigate the erosion of recovery of fixed costs due to energy efficiency. Explain whether shifting costs from the volumetric rate will also minimize the incentive for residential customers to participate in energy efficiency during a period of lower gas prices such as that currently being experienced.

RESPONSE:

The Company believes that even during periods of lower gas prices such as is currently being experienced, the gas commodity portion of a customer's bill will continue to comprise a large enough part of the total bill to provide customers with incentive to participate in energy efficiency.

PERSON RESPONSIBLE: James E. Ziolkowski

STAFF-DR-03-020

REQUEST:

Refer to the attachment to the response to Item 53 of Staff's Second Request, which shows the maintenance expenditures and savings, since the inception of the Accelerated Main Replacement Program ("AMRP") through 2008.

- a. Provide the level of maintenance expenditures included in the base and forecasted periods.
- b. Although the AMRP will continue through 2010, it appears that no adjustment has been proposed for the forecasted test period to reflect the continued decline in annual maintenance expenditures that has occurred consistently since 2001.

Explain why no further savings are anticipated.

RESPONSE:

- a. Refer to Schedule C-2.1 –Account 887 in the Company's filing. The base period amount is \$765,539 and the forecasted period amount is \$985,106.
- b. Mr. Hebbeler's testimony only reflected savings from AMRP inception through December 2008 for the reduction of leaks. Duke Energy Kentucky projects additional savings from leak reduction of \$21,000 in 2009 and \$7,000 in 2010. Actual costs incurred for the Transmission Integrity Management Program (TIMP) were not reflected in the reply to Staff-DR-02-053. Therefore, \$91,000 is included in account 887 for TIMP costs in the forecasted period. This amount was calculated as a four year average, three years of actuals (2006, 2007 and 2008) and one year projected (2009). In addition, the forecasted period includes \$165,000 for a new Distribution Integrity Management Program (DIMP) in account 887. The rules for this new program are scheduled to be issued by the end of 2009. The estimate of this cost was calculated using historical data from TIMP maintenance activities and converting to a cost per foot. The volume of work was calculated based on the mains other than new plastic or protected steel over the leak survey cycle.

The total account 887 for the forecasted period should be as follows:

2008 Maintenance Expense less TIMP	\$585,000
Additional Savings 2009 & 2010	(28,000)
TIMP expense (four year average)	91,000
DIMP expense	<u>165,000</u>
Total Account 887	\$813,000

The forcasted period amount included in the Company's filing is \$985,106. Therefore, this account is overstated by approximately \$172,000.

PERSON RESPONSIBLE: Robert M. Parsons / Gary J. Hebbeler



STAFF-DR-03-021

REQUEST:

Refer to response 54.a. of Staff's Second Request. Although each year following 2002 showed fewer leaks than the 2002 level which was described by Mr. Hebbeler as the "peak", the number of leaks increased in 2007 and again in 2008 following what appeared to be the trough in 2006. Provide an explanation of the increase in leaks and whether this trend is expected to continue.

RESPONSE:

The Accelerated Main Replacement Program (AMRP) priorities were based on the highest propensity for incidents. Therefore, variances in the reduction of leaks could occur in any given year. However, by the end of 2010, Duke Energy Kentucky will have eliminated all known 12" and less cast iron and bare steel mains. The potential for incident and leaks on all known 12" and less cast iron and bare steel mains will have been eliminated. Other variables may influence leaks on other types of materials. Any increase in trends at the completion of the program will be investigated and programs implemented such as the Riser Replacement Program to address potential issues.

PERSON RESPONSIBLE: Gary J. Hebbeler

STAFF-DR-03-022

REOUEST:

Refer to response 54.b. of Staff's Second Request. Customer outage per 1,000 customers, which Mr. Hebbeler calls the "most accepted reliability standard utilized within the gas industry", is at the highest level (.07) in both 2002 and 2005, and is higher in both 2007 and 2008 than in both of the immediately preceding years. Provide an explanation of the varying outage levels from 2002 to 2008, whether the trend of increasing outages is expected to continue, and whether the experience of Duke Energy's Gas Operations is considered representative of that of Duke Kentucky.

RESPONSE:

The Accelerated Main Replacement Program (AMRP) priorities were based on the highest propensity for incidents. Therefore, variances in the reliability standard could occur in any given year. However, by the end of 2010, Duke Energy Kentucky will have eliminated all known 12" and less cast iron and bare steel mains. The potential for reliability standard issues involving deteriorated known 12" and less cast iron and bare steel mains will have been eliminated. Other variables may influence this reliability standard. Any increase in trends at the completion of the program will be investigated and programs implemented to address any potential issues.

PERSON RESPONSIBLE: Gary J. Hebbeler